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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

v.

Antoine Reese Thomas,

Defendant.

Case:5:21-cr-20536
Judge: Levy, Judith E.
MJ: Patti, Anthony P.
Filed: 08-18-2021 At 12:48 PM
INDI USA V. THOMAS (DA)

Violations:
18 U.S.C. § 875(c)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

**18 U.S.C. § 875(c) –
Transmitting a Communication Containing
a Threat to Injure a Person**

Between on or about July 17, 2021, and July 20, 2021, in the Eastern District of Michigan, defendant, Antoine Reese Thomas, did knowingly and willfully, that is, with the intent to communicate a true threat and with knowledge that it would be viewed as a true threat, transmit in interstate commerce communications, specifically a series of text messages to an employee of a staffing company that provides services to an automotive manufacturing company in Highland Park, Michigan, containing threats to injure the person of another, that is, employees and

other persons present at said automotive manufacturing company, by bombing or committing a mass shooting at the company's location.

All in violation of Title 18, United States Code, Section 875(c).

FORFEITURE ALLEGATION

1. The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference. Pursuant to Fed. R. Cr. P. 32.2(a), 18 USC § 981(a)(1)(C), and 28 USC § 2461, the government hereby provides notice to the defendant of its intention to seek forfeiture of any property, real or personal, which constitutes or is derived from proceeds traceable to the violations alleged in Count One.

2. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of Defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL

s/ Grand Jury Foreperson

GRAND JURY FOREPERSON

SAIMA S. MOHSIN
Acting United States Attorney

BENJAMIN COATS
Chief, Major Crimes Unit
Assistant United States Attorney

s/ Erin Ramamurthy

ERIN RAMAMURTHY
Assistant United States Attorney

Dated: August 18, 2021

United States District Court
Eastern District of Michigan

Criminal Case Cover

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately

Companion Case Information	Companion Case Number:
This may be a companion case based on LCrR 57.10(b)(4) ¹ :	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: ELR

Case Title: USA v. Antoine Reese ThomasCounty where offense occurred: Wayne

Offense Type: Felony

Indictment -- based upon prior complaint [Case number: 21-mj-30364]

Superseding Case Information

Superseding to Case No: _____ Judge: _____

Reason:

Defendant NameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case

August 18, 2021

Date



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Bar #: P81645

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.